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*Attorneys for Defendants World  
Wrestling Entertainment, LLC, and  
Fanatics, LLC*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

WESLEY EISOLD, an individual,  
Plaintiff,

vs.

CODY GARRETT RUNNELS, an  
individual, WORLD WRESTLING  
ENTERTAINMENT, LLC, a limited  
liability company; and FANATICS,  
LLC, a limited liability company,

Defendants.

Case No.: 2:24-CV-07516-AB(MARx)  
[Hon. André Birotte Jr.]

**JOINT STIPULATION TO  
EXTEND TIME TO RESPOND TO  
PLAINTIFF'S SECOND  
AMENDED COMPLAINT, WITH  
AGREED BRIEFING SCHEDULE,  
AND TO REQUEST  
CONTINUANCE OF  
SCHEDULING CONFERENCE**

Action Filed:  
September 4, 2024

Second Amended Complaint Filed:  
December 16, 2024

Current Response Date:  
January 17, 2025

Proposed Response Date:  
February 21, 2025

Trial Date: None Set

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## JOINT STIPULATION AND REQUEST

This Joint Stipulation is entered into by and between Defendants Cody Runnels (“Runnels”), World Wrestling Entertainment, LLC (“WWE”), Fanatics, LLC (“Fanatics”), and Plaintiff Wesley Eisold (“Eisold”) (Runnels, WWE, Fanatics, and Eisold are collectively referred to hereinafter as the “Parties”), by and through their respective counsel.

WHEREAS, Eisold filed his Complaint against Defendants on September 9, 2024 (Dkt. No. 1);

WHEREAS, on October 10, 2024, Eisold, WWE, and Fanatics stipulated to a thirty-day extension of time for WWE and Fanatics to respond to Eisold’s Complaint (Dkt. No. 15), and Eisold and Runnels later entered into a stipulation to coordinate his response with the other Defendants on October 25, 2024 (Dkt. No. 19);

WHEREAS, on October 24, 2024, the Parties stipulated that Eisold would amend his Complaint to correct an error in Fanatics’ name (Fanatics was erroneously sued as Fanatics Holdings, Inc. instead of Fanatics, LLC) and that this amendment should not constitute Eisold’s amendment as of right under Rule 15(a) of the Federal Rules of Civil Procedure (Dkt. No. 17);

WHEREAS, on October 30, 2024, the Court approved the Parties’ October 24, 2024, Stipulation to Amend (Dkt. No. 22);

WHEREAS, on November 1, 2024, Eisold filed, pursuant to the October 30, 2024, Order, his First Amended Complaint (Dkt. No. 23);

WHEREAS, on November 22, 2024, WWE and Fanatics filed a Motion to Dismiss Plaintiff’s First Amended Complaint (Dkt. No. 26), in which Runnels joined, along with his own Motion to Dismiss (Dkt. Nos. 28, 29);

WHEREAS, on November 26, 2024, the Court entered an Order setting the Rule 26 Scheduling Conference (Dkt. No. 30), setting February 7, 2025 for the scheduling conference;

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1 WHEREAS, on December 13, 2024, Eisold filed his Second Amended  
2 Complaint (Dkt. No. 34);

3 WHEREAS, on December 16, 2024, the Court issued a Notice of Deficiency  
4 with respect to Eisold's Second Amended Complaint on the basis that Eisold needed a  
5 stipulation or leave of court to file the amended pleading;

6 WHEREAS, based on the December 16<sup>th</sup> filing, which Defendants agree is  
7 procedurally proper based on the Parties' October 24, 2024 stipulation, the Defendants'  
8 (Runnels, WWE, and Fanatics) last day to file an answer or other responsive pleading  
9 was December 30, 2024;

10 WHEREAS, on December 27, 2024, the Parties' stipulated to an extension of  
11 time for Defendants to respond to Eisold's Second Amended Complaint to January 17,  
12 2024 (Dkt. No. 38), which the Court approved on December 30, 2024 (Dkt. No. 39).

13 WHEREAS, On January 13, 2025, counsel for the Parties met and conferred on  
14 Plaintiff's Second Amended Complaint, and agreed that, due to (1) operational and  
15 staffing challenges for the Parties due to the recent wildfire disaster in California, (2)  
16 the defense's need to coordinate filings among multiple parties; and (3) Plaintiff's  
17 counsel's vacation travel commitments, good cause exists to extend the current  
18 response and briefing schedule. The Parties further conferred and agreed to jointly  
19 request a continuance of the scheduling conference to preserve resources while the  
20 pleadings are unsettled and the scope of discovery uncertain;

21 NOW, THEREFORE, the Parties, by and through their respective undersigned  
22 counsel of record, hereby stipulate and request as follows:

23 The responsive pleading of Runnels, WWE, and Fanatics may be filed on or  
24 before February 21, 2025, set to be heard on April 11, 2025.

25 Plaintiff's opposition to any motion to dismiss filed by Runnels, WWE, and/or  
26 Fanatics may be filed on or before March 14, 2025.

27 Defendants' reply to Plaintiff's opposition may be filed on or before March 28,  
28 2025.

1 The initial case scheduling conference shall occur at a date and time at the  
2 Court's convenience on or after April 25, 2025.

3 Dated: January 15, 2025 HOLLAND & KNIGHT LLP

4  
5 /s/ Stacey H. Wang

6 Stacey H. Wang, Esq.  
7 Danielle N. Garno, Esq.

8 *Attorneys for Defendants*  
9 *World Wrestling Entertainment, LLC and*  
10 *Fanatics, LLC*

11 Dated: January 15, 2025 KING HOLMES PATERNO AND SORIANO LLP

12 /s/ Heather Pickerell, Esq.

13 Heather Pickerell, Esq.

14 *Attorneys for Plaintiff, Wesley Eishold*

15 Dated: January 15, 2025 JAYARAM PLLC

16 /s/ Vivek Jayaram

17 Vivek Jayaram, Esq.

18 *Attorney for Defendant, Cody Runnels*

**DECLARATION OF CONSENT TO ELECTRONIC SIGNATURE:**

I, Stacey H. Wang, attest pursuant to L.R. 5-4.3.4 of the United States District Court for the Central District of California that the above signatories, on whose behalf the filing is submitted, concurs in the filing's content and has authorized the filing.

Dated: January 15, 2025

/s/ Stacey H. Wang  
Stacey H. Wang, Esq.

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